


Application Granted



Valerie Figueredo, U.S.M.J.

DATED:

8-29-2022



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August 29, 2022

BY ECF

Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Gabino Genao v. City of New York, et al., 21-CV-00301 (AT) (VF)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and attorney for defendants City, Harvey, Brann, Moise, Nwosu, Freemantle, Cohall, and McCarthy. Defendants write to respectfully request a brief, two day extension, from August 29, 2022, to August 31, 2022, file a supplemental brief to support defendants' proposed redactions to the Chemical Agent Directive. See Docket Entry No. 75. Defendants were unable to obtain plaintiff's position on this request due to his incarcerated status.

By way of background, *pro se* plaintiff alleges, inter alia, that on December 16, 2020, there was a "fire incident" in his cell, and that the defendant officers were deliberately indifferent to his medical needs. See Docket Entry No. 2. Following a discovery status conference, Your Honor ordered defendants to produce certain Department of Corrections directives to plaintiff. See Docket Entry dated June 6, 2022. In light of this Order, the Court endorsed a confidentiality stipulation prior to defendants' production of these directives to plaintiff. See Docket Entry No. 65. The Court also provided defendants an opportunity to propose redactions to these directives for the Court's *in camera* review. On June 10, 2022, the undersigned emailed chambers *ex parte* with proposed redactions for Chemical Agent Directive on 4510R-H. Defendants did not propose redactions to any other directive.

On August 16, 2022, the parties attended another discovery status conference. See Docket Entry No. 75. During this conference, the Court provided defendants an opportunity to

indicate support for their proposed redactions to the Chemical Agent Directive, and calendared defendants' due date to provide such support for August 29, 2022. Id.

Although the defendants have been working diligently on this matter, defendants respectfully request a brief, two day extension of time to finalize their supplemental brief and related affidavit before filing.

Therefore, defendants respectfully request a brief, two day extension, from August 29, 2022, to August 31, 2022, to file their supplemental brief and supporting documents.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Caroline McGuire

Assistant Corporation Counsel
Special Federal Litigation

cc: Gabino Genao
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